

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

KENNETH BROOKS,	)	
Plaintiff,	)	
	)	
V.	)	Case Number: 1:05 cv 11674 GAO
	)	
THE UNITED STATES OF AMERICA, and )		
MARY JANE ESTRADA, N.P.	)	
Defendants.	)	

**PLAINTIFF'S DISCLOSURE OF MEDICAL INFORMATION  
TO DEFENDANTS PURSUANT TO RULE 35.1**

Now comes the plaintiff, Kenneth Brooks, and pursuant to Local Rule 35.1, makes the following disclosure of medical information regarding the diagnosis, care, or treatment of Kenneth Brooks.

Pursuant to Local Rule 35.1(a)(1), the plaintiff has requested the appropriate medical bills and will disclose an itemization of all medical expenses incurred as soon as they are received.

Pursuant to Local Rule 35.1(a)(2), the plaintiff identifies the following health care providers as having diagnosed, cared for, or treated Kenneth Brooks.

1. **Michael Folino, M.D.**  
Geiger-Gibson Community Health Center  
250 Mount Vernon Street  
Dorchester, MA 02125
2. **Weiru Shao, M.D.**  
New England Medical Center  
750 Washington Street  
Boston, MA 02111
3. **Stephen G. Werth, M.D.**  
Associates of South Shore Dermatology  
Carney Hospital  
Seton MOB, Suite 206  
2110 Dorchester Avenue  
Dorchester, MA 02124

4. Any and all medical providers at **Geiger-Gibson Community Health Center**, 250 Mt. Vernon Street, Dorchester, MA 02125, including but not limited to:

Michael Folino, M.D.  
Robert Hoch, M.D.  
Elizabeth Kissinger, M.D.  
Stefan Jahng, M.D.  
David Gunther, M.D.  
Mary Jane Estrada, N.P.

5. Any and all medical providers at **New England Medical Center**, 750 Washington Street, Boston, MA 02111, including but not limited to:

Weiru Shao, M.D.  
Donald Annino, M.D.  
Rahul Shah, M.D.  
Stephen P. Naber, M.D.  
Arthur Tischler, M.D.  
Adarsh Vasanth, M.D.  
Lynn Kandar, R.N.  
William Jackson, M.D.  
Kathy Goldrick, R.N.  
Marian Lemieux, R.N.  
Scott Weiner, M.D.  
Nicholas Ross, M.D.  
Barbara English, R.N.  
Nancy Dryer, R.N.  
Michael Chan, M.D.  
Markus Fitzek, M.D.

While Local Rule 35.1 (a)(2)(a) allows the defendant to inspect and copy, at the defendant's expense, all of the relevant medical records pertaining to the diagnosis, care, and treatment of Kenneth Brooks, the plaintiff has provided the complete medical and office records of each health care provider named above.

1. Please refer to *Attachment A*, medical records from Michael Folino, M.D.
2. Please refer to *Attachment B*, medical records from Associates of South Shore Dermatology including reports and notes from Stephen Werth, M.D.
3. Please refer to *Attachment C*, medical records, including office notes, laboratory results, and radiology reports, from New England Medical Center.

4. Please refer to *Attachment D*, medical records, including radiology and oncology reports, from Geiger-Gibson Community Health Center.
5. Please refer to *Attachment E*, medical records and notes from Weiru Shao, M.D.

Respectfully submitted,  
The plaintiff,  
By his attorney,

/s/ William J. Thompson  
WILLIAM J. THOMPSON  
LUBIN & MEYER, P.C.  
100 City Hall Plaza  
Boston MA 02108  
(617) 720-4447  
BBO#: 559275